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*Attorneys for Defendant
Paul E. Gaulin, M.D.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EDWIN VELEZ, an individual,
Plaintiff,

vs.

MICHAEL MINEV, in his individual and official capacities; DR. MARTIN J. NAUGHTON, M.D., in his individual and official capacities; DR. KIM A. ADAMSON, M.D., in his individual and official capacities; DR. MICHAEL D. MCKEE, M.D., in his individual and official capacities; DR. CAROL L. ALLEY, M.D., in her individual and official capacities; DR. HENRY R. LANDSMAN, m.d., in his individual and official capacities; DR. ROEHL PENA, M.D., in his individual and official capacities; and DR. PAUL E. GAULIN, M.D., in his individual capacity;

Defendants.

CASE No. 3:21-cv-00197-ART-CSD

STIPULATION FOR EXTENSION
OF TIME TO RESPOND TO
SECOND AMENDED COMPLAINT
ON BEHALF OF DEFENDANT
PAUL E. GAULIN, M.D.

(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff EDWIN VELEZ and Defendant PAUL E. GAULIN, M.D., through their respective counsel, that the time for Dr. Gaulin to file a response to the Second Amended Civil Rights Complaint (ECF No. 67) may be extended to October 31, 2024.

An extension to respond to the Second Amended Complaint is sought to investigate whether Dr. Gaulin should be dismissed from the above-entitled matter due to lack of state action.

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1 This extension is not sought for purposes of delay or for any other improper purpose.

2 **IT IS SO STIPULATED.**

3 DATED: October 4, 2024

DATED: October 4, 2024

4 FOX ROTHSCHILD, LLP

LEMONS, GRUNDY & EISENBERG

5 By: /s/ Daniel Mann

By: /s/ Alice Campos Mercado

6 Daniel Mann
7 Colleen E. McCarty

Alice Campos Mercado

8 *Attorneys for Plaintiff*

Attorneys for Defendant
Paul E. Gaulin, M.D.

10 **ORDER**

11 **IT IS SO ORDERED.**

12 DATED: October 7, 2024

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14 

15 HON. CRAIG S. DENNEY
16 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I am a citizen of the United States. My business address is 6005 Plumas Street, Third Floor, Reno, Nevada 89519, and I am employed by LEMONS, GRUNDY & EISENBERG in the City of Reno and County of Washoe where this service occurs. I am over the age of 18 years and not a party to the within action.

On October 4, 2024, following the ordinary business practice, I electronically filed and served through the CM/ECF program the foregoing document to the addressee(s) listed below described as ***Stipulation for Extension of Time to Respond to Second Amended Complaint on Behalf of Defendant Paul E. Gaulin, MD***

_____ **BY MAIL:** in an envelope with postage thereon fully prepaid to be placed in the U.S. Mail at Reno, Nevada;

_____ **BY PERSONAL SERVICE:** in an envelope to be hand delivered this date;

_____ **BY OVERNIGHT DELIVERY:** in an envelope to be delivered to an overnight delivery carrier with delivery fees provided for;

_____ **BY FACSIMILE:** by transmitting by facsimile to the respective fax telephone phone number(s);

✓ _____ **BY ELECTRONIC SERVICE:** the court to electronically serve the following individual(s):

Colleen E. McCarty Daniel Mann FOX, ROTHSCHILD LLP One Summerlin 1980 Festival Plaza Dr., Ste. 700 Las Vegas, NV 89135 <i>Attorneys for Plaintiff</i>	Rudolf M. D'Silva Laura M. Ginn STATE OF NEVADA, OFFICE OF THE ATTORNEY GENERAL Public Safety-NDOC Division 100 N. Carson St. Carson City, NV 89701 <i>Attorneys for Defendant</i> <i>Nevada Dept. of Corrections</i>
Amanda Patanaphan MCBRIDE HALL 8329 West Sunset Road, Suite 260 Las Vegas, NV 89113 <i>Attorneys for Defendant</i> <i>Roehl Pena, M.D.</i>	

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

/s/ Margie Nevin
Margie Nevin